

EXHIBIT B

1 IN THE UNITED STATES DISTRICT COURT
2 WESTERN DISTRICT OF ARKANSAS
3 FAYETTEVILLE DIVISION

4 JILL DILLARD, JESSA SEEWALD,)
5 JINGER VUOLO, and JOY DUGGAR,)
6 PLAINTIFFS,)
7 VS.)
8))
9 CITY OF SPRINGDALE, ARKANSAS;) CASE NO.
10 WASHINGTON COUNTY, ARKANSAS;) 17-CV-05089-TLB
11 KATHY O'KELLEY, in her Individual)
12 and Official Capacities; ERNEST)
13 CATE, in his Individual and)
14 Official Capacities; RICK HOYT,)
15 in his Individual and Official)
16 Capacities; STEVE ZEGA, in his)
17 Official Capacity;)
18 Does 1-10, Inclusive,)
19 DEFENDANTS.)

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23 ORAL AND VIDEOTAPED DEPOSITION OF

24

25 JESSA SEEWALD

26

27 September 13, 2021

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30 ORAL AND VIDEOTAPED DEPOSITION OF JESSA SEEWALD,

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32 produced as a witness at the instance of the
33 DEFENDANTS, and duly sworn, was taken in the
34 above-styled and numbered cause on the 13th day of
35 September, 2021, from 10:03 a.m. to 2:57 p.m., before
36 Tammie L. Foreman, CCR in and for the State of
37 Arkansas, RPR, CRR, reported by machine shorthand, via
38 audio-video conference, pursuant to the Federal Rules
39 of Civil Procedure.

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23 ALSO PRESENT:

24 Garrett Smelley, Certified Legal Video Specialist

25

1 classes kind of thing.

2 Q. Okay. When did you -- you're married currently,
3 correct?

4 A. Yes.

5 Q. When -- when were you married?

6 A. I was married November 1st of 2014.

7 Q. Okay. And how old were you at that time?

8 A. 21.

9 Q. Okay. Did you live in your parents' home until
10 that time?

11 A. Yes, sir.

12 Q. Okay. How about -- how about work? Do you work
13 outside the home currently?

14 A. No, sir. I'm a stay-at-home mom.

15 Q. Sure. How many children do y'all have?

16 A. Just had our fourth.

17 Q. Fourth. Okay. I've got three myself. I know
18 how that is.

19 A. Yes. It's lively.

20 Q. Yeah. So have you ever worked outside the home?

21 A. No, sir.

22 Q. Okay. Do you do any -- have you ever done any
23 work for income?

24 A. Yes. I have worked with my dad and I guess --
25 so technically, yeah. I have worked outside the home

1 in that sense, but family business. My dad does real
2 estate, so we would help flip houses. Or he does a
3 lot of commercial real estate, too. And so some of my
4 sisters and I would help him with design. And we also
5 did a TV show for a while, so I guess that's kind of
6 work.

7 Q. Right.

8 A. And yeah.

9 Q. Some of your sisters do social media for income.
10 Have you ever done any of that?

11 A. Yes, sir. I do.

12 Q. What platforms are you on?

13 A. Instagram, Twitter, Facebook, and YouTube.

14 Q. And just ballpark, how much income did you bring
15 in through social media last year?

16 A. I'm not sure. Maybe -- if I were to guess,
17 maybe 30,000.

18 Q. Okay.

19 A. But it could be more or less.

20 Q. Sure. What is your husband's name?

21 A. Ben Seewald. Benjamin Seewald.

22 Q. What does he do?

23 A. He's a pastor.

24 Q. Oh, okay. What church?

25 A. Immanuel Baptist Church in Springdale.

1 wake of all that?

2 A. Oh, yeah. Heaps. Like, I didn't even want to
3 go on social media for a long time because people were
4 so nasty. Like, "Oh, you're a bunch of perverts. The
5 whole family is perverted," like, "Incest. Your
6 brother raped you. You're sickos." Like, yeah. I
7 mean, it was just -- it was disgusting.

8 Q. Okay. Have you ever been emotionally upset
9 about these redacted disclosures or --

10 MR. BLEDSOE: Object to the form.

11 Q. -- the publication of those disclosures?

12 A. Yeah. I mean, of course.

13 Q. Okay. Has the sort of rehashing of these events
14 in this lawsuit caused you any problems?

15 A. Not problems. I think finding solutions. Like,
16 wanting to make sure that justice is upheld and that
17 if somebody did something that they shouldn't have,
18 that they make amends. Like, that's, I guess,
19 positive.

20 Q. Did Josh ever make amends to you or any of your
21 sisters?

22 A. You mean, like, ask for forgiveness or, like,
23 what do you mean by "amends"?

24 Q. Yeah. You just used a phrase "make amends."
25 Whatever you meant by that. Did he ever do that?

1 MR. BLEDSOE: Object to the form.

2 A. I said that, you say?

3 Q. Yeah. You used that phrase in the previous
4 answer.

5 A. Oh, oh, yeah. I mean, yeah. I would say, like,
6 he asked forgiveness and, like, yeah. Your
7 relationship isn't instantly just, like, one of trust,
8 but I think over time, like, we didn't have an issue
9 with one another. Like, it wasn't ongoing after that,
10 and I wanted to believe he was changing for the
11 better.

12 Q. What do you think about that now?

13 MR. BLEDSOE: Object to the form.

14 A. I guess we'll see.

15 Q. Okay. Other than with your attorneys in this
16 lawsuit, have you ever discussed with anyone filing a
17 lawsuit against Josh?

18 A. No.

19 Q. What do you think of your parents' handling of
20 the molestations?

21 A. I think in hindsight, they would say they
22 probably could have done better. But I think they
23 were trying to do the best they knew how. Any parent
24 that's put in a situation like that would probably --
25 yeah.

1 Q. In your perspective, what would have been better
2 for your parents to have done than what they did?

3 MR. BLEDSOE: Object to the form.

4 A. I don't know. I mean, I -- I -- yeah. I don't
5 know.

6 Q. Have they ever said to you that they wish they
7 had done anything in particular differently?

8 A. No. No. Just they think that they probably
9 could have done better.

10 Q. You never blamed yourself for anything, have
11 you, in relation to your molestations?

12 A. No. No.

13 Q. Have you ever been diagnosed with any mental
14 health conditions of any kind?

15 A. No, sir.

16 Q. Were you physically injured by the redacted
17 disclosures in this case?

18 MR. BLEDSOE: Object to the form.

19 A. Nobody ever, like, walked up and slapped me in
20 the face. But it definitely, like, affected, my,
21 like, physical movement. Like, going about my day in
22 a regular manner and, like, doing what I would
23 normally do and going places I would normally go for
24 quite a while. So maybe in a sense.

25 Q. Okay. Did you ever seek any medical care or

1 A. Jessa Seewald.

2 Q. And so just the one?

3 A. Yeah.

4 Q. Okay. And same with Twitter?

5 A. Yeah.

6 Q. Just one? Do you share those with your husband
7 or does he have separate ones besides --

8 A. He has his own. He doesn't do YouTube. But
9 yeah, he has Twitter. Ben Seewald on Twitter.

10 Ben Seewald on Instagram. And Ben Seewald on Facebook
11 page.

12 Q. Okay. And then he also posts, I think, to the
13 church Facebook as well?

14 A. I think somebody else runs that for him.

15 Q. Okay. Do you use any other kind of app besides
16 your, kind of, iPhone texting to communicate? Do you
17 use any kind of a instant messenger or Slack or
18 anything like that besides just texting?

19 A. No.

20 Q. Okay.

21 A. Just texting.

22 Q. Okay. Social media, you mentioned that you made
23 money last year. You do make money during the year
24 doing social media work. When I say social media
25 partnerships, that's kind of what I mean. Like you're

1 partnering with a product, an agency, something like
2 that. So that's what I'm going to use. And I just
3 want to ask you if you enjoy doing that work, if you
4 enjoy the social media partnerships.

5 A. Yeah.

6 Q. What do you do, Ms. Seewald, to sort of foster
7 or grow that business?

8 A. Not much. I mean, yeah. We have people that
9 will contact us and want us to promote their brand or
10 their product, I guess.

11 Q. Okay. When you say you have people, are those
12 people that you have a contract with, are contracted
13 to work with?

14 A. I don't actually, like, contact people or, like,
15 they don't contact me directly. They go through -- I
16 worked through Central Entertainment Group for a
17 little while, and then I worked through the Gift Shop
18 for a little while.

19 Q. Are you still with the Gift Shop?

20 A. Yes, sir.

21 Q. Okay. And so they're the ones that bring you
22 ideas, if you want to do this or not sort of thing?

23 A. Yes.

24 Q. Okay. So you mentioned you don't do much to
25 foster or grow that. Could you do more if you could,

1 if you could do it and work into the time that you
2 have available for it?

3 A. Well, I just -- people have reached out to the
4 agents and, like, they'll send me stuff. And it's
5 been -- yeah. It's been, like, plenty of stuff, like,
6 I don't feel like I need to go looking for anything.

7 Q. Okay.

8 A. I'm a busy mom, too.

9 Q. Right. Right. You said four, right?

10 A. Yes.

11 Q. What is it -- what is the Gift Shop looking for
12 from you to continue to want to bring you products?
13 Are they looking for activity on your social media
14 accounts by way of, you know, followers or hits or
15 views, or is there something else they're looking for
16 when they want to work with you, as far as you know,
17 as far as you understand?

18 A. They don't run any of my social media or
19 anything like that. So I just post, like, whatever
20 regular stuff, and all they do is they just -- people
21 contact them if they're interested in, like,
22 advertising with us. So I don't know what -- how they
23 judge all that or whatever.

24 I mean, I guess I've got kids, so maybe
25 people might be sending me, like, kid clothes products

1 or things like that that they're interested in me
2 promoting. Like, kid family stuff. Like, it's
3 probably just like whatever my daily life kind of
4 looks like, they -- I don't know how I am with that.

5 Q. Would you do more -- would you do more
6 television if you could? If the offer came along to
7 do reality TV, would you do that?

8 A. Not right now.

9 Q. Why not?

10 A. I'm busy.

11 Q. You're so --

12 A. Life is busy right now. I mean, I've got, yeah,
13 four young kids and all that.

14 Q. Okay. So this is a little bit of a rhetorical
15 question, but who in the world could be busier than
16 your mom when she was doing the show, right? So --

17 A. It's not that I couldn't. It's just that, like,
18 do I have desire. I guess I don't really -- I'm not
19 looking to turn around and, like, do it all over again
20 right now.

21 Q. Okay. Do you have that planned in the future?
22 Like, at a certain point, we might be open to that
23 again, or is that just not something --

24 A. I'm not planning on it for any period of time,
25 but I'm not saying that I wouldn't ever either. Like,

1 I don't know. I haven't given it much thought.

2 Q. Has anyone told you, from either Gift Shop or
3 the other agency or anybody that advises you, that
4 right now, Josh being out there is creating barriers
5 to you getting more work or more products coming your
6 way?

7 A. Nobody has said that to me.

8 Q. Okay. Do you feel that that's the case?

9 A. Not especially. I mean, obviously the show is
10 gone because of that, but I don't know.

11 Q. Yeah. I understand that. And I just think now
12 that you and your sisters are sort of continuing on
13 your own with social media and, you know, able to get
14 paid for the different partnerships, do you feel like
15 Josh being in the news hinders that in any way?

16 A. I mean, it probably does in some ways. I don't
17 know.

18 Q. Okay. You guys -- you and Mr. Owens talked
19 about, like, after the Freedom of Information Act --
20 which I am going to call FOI usually. After that
21 release, there were a lot of ugly things, you said,
22 written on social media. Today, as you sit there
23 today, do you ever get, like, ugly comments and posts
24 on your various platforms?

25 A. I do some, but I also feel like those are my

1 A. Yeah. I remember he had his hair buzz cut or,
2 like, yeah. I remember when he was down, like, with
3 our friends. But yeah.

4 Q. But that wasn't part of the service -- any
5 service that you attended?

6 A. It sounds really bizarre to me. I've never
7 heard of anything like that. A ceremony? No. He got
8 a haircut. But, like, I didn't -- yeah. I didn't
9 think anything of it.

10 Q. Do you know if the haircut was in any way
11 related to his confession, that he made one?

12 A. I have no clue what you are talking about
13 honestly. Like, any type of a -- any of that. Like,
14 ceremony and confession. I don't know. I don't
15 recall any of that.

16 Q. Okay. Do you have the occasion to talk to your
17 sisters about the times that Josh appears in the news,
18 whether it was with David Dillard or Ashley Madison or
19 this recent arrest?

20 A. We don't just sit around talking about it. I'm
21 sure we've said like, "Oh, that's unfortunate." But
22 we don't, like, just, like, yeah, call up and, like,
23 that's not a topic of discussion.

24 Q. So is there any -- okay. So I should say it's
25 not a regular thing. But if it comes up, it might

1 REPORTER CERTIFICATION

2 STATE OF ARKANSAS)

3 COUNTY OF PULASKI)

4 I, TAMMIE L. FOREMAN, Certified Court Reporter
in and for the aforesaid county and state, do hereby
5 certify to the following:

6 1) The foregoing deposition was taken before
me at the time and place stated in the foregoing
7 styled cause with the appearances as noted;

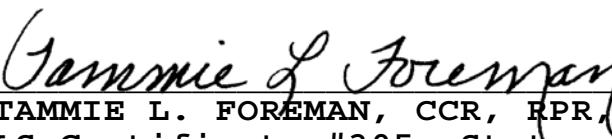
8 2) Being a Certified Court Reporter, I then
reported the deposition in Stenotype to the best of my
9 skill and ability, and the foregoing pages contain a
10 full, true, and correct transcript of my said
Stenotype notes then and there taken;

11 3) I am not in the employ of and am not
related to any of the parties or their counsel, and I
12 have no interest in the matter involved;

13 4) Signature of the witness is not waived.

14 IN WITNESS WHEREOF, I have hereunto set my
hand and affixed my seal of office this 30th day of
15 September 2021.



16 
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1 ERRATA SHEET FOR THE DEPOSITION OF JESSA SEEWALD

2 Taken on September 13, 2021

3 PAGE	LINE	CORRECTION	REASON FOR CHANGE
4 44	16	"They were tipped off..."	Currently says, "We weren't..."
5			
6 54	1	"I don't know, not always..."	Currently missing "not"
7			
8 84	16	"That's kind of a ..."	Currently missing "That's"
9			
10 88	8	"it was just focused on..."	Currently says, "focus"
11			
12 95	17, 19	"the Gift Shoppe"	Currently says, "Shop"
13			
14 104	21	"probably hundreds of thousands"	Currently says, "a hundred thousands"
15			
16 114	13	"Not as far as I know"	Currently missing "not"
17			
18			
19			
20			
21			
22		I certify that I have read my deposition and request that the above changes be made.	
23			
24			10/30/21
25		JESSA SEEWALD	Date